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Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR OPPOSITION TO  
WAYMO'S SUPPLEMENTAL BRIEF IN  
SUPPORT OF WAYMO'S MOTION IN  
LIMINE NO. 4**

19 the

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants' Uber Technologies, Inc. and  
7 Ottomotto LLC's Administrative Motion to File Under Seal Their Opposition to Waymo's  
8 Supplemental Brief in Support of Waymo's Motion *in Limine* No. 4 (the "Administrative Motion").  
9 The Administrative Motion seeks an order sealing highlighted portions of Defendants' Opposition to  
10 Waymo's Supplemental Brief in Support of Waymo's Motion *in Limine* No. 4 ("Uber's Opposition")  
11 and Exhibit 1 thereto, as well as the entirety of Exhibits 4 and 6.

12 3. The green highlighted portions of Exhibit 1, as well as the entirety of Exhibit 4, contain  
13 or refer to trade secrets and confidential business information, which Waymo seeks to seal.

14 4. Exhibit 1 (green highlighted portions) and Exhibit 4 (entire document) contain,  
15 reference, and/or describe Waymo's asserted trade secrets, including as misappropriated by  
16 Defendants. The information Waymo seeks to seal includes the confidential design and functionality  
17 of Waymo's proprietary autonomous vehicle system, including its source code, which Waymo  
18 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-  
19 47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of  
20 this information would give Waymo's competitors access to descriptions of the functionality or  
21 features of Waymo's autonomous vehicle system. If such information were made public, I understand  
22 that Waymo's competitive standing would be significantly harmed.

23 5. Exhibit 4 (entire document) additionally contains, references, and/or describes  
24 Waymo's highly confidential and sensitive business information. The information Waymo seeks to  
25 seal regards confidential details regarding Waymo's business, including employee compensation  
26 details. I understand that this confidential business information is maintained by Waymo as secret.  
27 The public disclosure of this information would give Waymo's competitors access to Waymo's  
28 business strategy for its autonomous vehicle system. If such information were made public, I

1 understand that Waymo's competitive standing would be significantly harmed. In addition, such  
2 disclosure would cause Waymo and its employees and/or former employees substantial harm due to  
3 the high public profile of this litigation.

4 6. Waymo's request to seal is narrowly tailored to those portions of Exhibits 1 and 4 that  
5 merit sealing.

6  
7 I declare under penalty of perjury under the laws of the State of California and the United  
8 States of America that the foregoing is true and correct, and that this declaration was executed in San  
9 Francisco, California, on October 30, 2017.

10 By /s/ Felipe Corredor

11 Felipe Corredor

12 Attorneys for WAYMO LLC

13  
14 **ATTESTATION**

15 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
16 document has been obtained from Felipe Corredor.

17  
18 By: /s/ Charles K. Verhoeven

19 Charles K. Verhoeven